IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Anthony E. Heindl Jr. aka Anthony E Heindl

Debtor(s)

CHAPTER 13

M&T Bank

Movant

vs.

NO. 20-01345 HWV

Anthony E. Heindl Jr. aka Anthony E Heindl

Debtor(s)

Jack N. Zaharopoulos

<u>Trustee</u>

Nature of Proceeding: Motion for Relief

from Stay

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance; Please continue the hearing 30 days to allow the parties more time to work on a resolution .

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: March 24, 2023

/s/ Michael P. Farrington Michael P. Farrington, Esq. KML Law Group, P.C. BNY Mellon Independence Center 701 Market Street, Suite 5000 Philadelphia, PA 19106 Phone: (215)-627-1322

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